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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
PLAINTIFFS' PROPOSED ORDERS TO  
AUGUST 2, 2021 JOINT SUBMISSION IN  
RESPONSE TO DKT. 191, 191-1 RE:  
STATUS OF DISCOVERY DISPUTES**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Google's Motion to Seal Plaintiffs' Proposed Orders to August 2, 2021 Joint Submission In Response To Dkt. 191, 191-1 Re: Status of Discovery Disputes ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Document Sought to Be Sealed</b>	<b>Court's Ruling on Motion to Seal</b>	<b>Basis for Sealing Portion of Document</b>
Plaintiffs' Proposed Order re Custodian and Search Terms	GRANTED as to redacted portions at:  Page 2, lines 12, 14-22; Page 3, lines 2, 4, 5-6, 9, 11-13, 17-19, 21-23, 27; Page 4, lines 1, 5-7, 11-13, 18-19, 23-25; Page 5, lines 1, 3, 7, 9-10, 13-15, 21, 24-28; Page 6, lines 5-7, 11, 13, 15, 19-22, 25-26; Page 7, lines 4-7, 11-12, 16, 18-19, 23-24, 27; Page 8, lines 2-3, 7-10, 13-15, 18-20, 24, 26; Page 9, lines 3-5, 10, 14-15, 19-20, 23, 25-26; Page 10, lines 2-4, 7-9, 12-13	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers and projects, and various data logs maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Plaintiffs' Proposed Order re Sundar Pichai Production	GRANTED as to redacted portions at:  Page 2, lines 9-15	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers and projects, and various data logs maintained by Google, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1           **SO ORDERED.**

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3 DATED: \_\_\_\_\_

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4 HON. SUSAN VAN KEULEN  
United States Magistrate Judge  
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